

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Javette L. Stone Lance E. Stone <div style="text-align: right;">Debtors</div> <hr/> WELLS FARGO BANK, N.A. <div style="text-align: right;">Movant</div> v. Javette L. Stone Lance E. Stone and Scott Waterman, Esquire <div style="text-align: right;">Respondents</div>	18-14682 JKF Chapter 13 Proceeding
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CERTIFICATION OF DEFAULT

WELLS FARGO BANK, N.A., a secured creditor in the above captioned bankruptcy case, by and through its counsel, Amanda L. Rauer, Esquire of the law firm of POWERS KIRN, LLC, hereby files this certification, and states:

1. I am the attorney responsible for handling the instant matter for WELLS FARGO BANK, N.A., and I have sufficient knowledge to make this certification on its behalf.
2. On 11/27/2018, an Order was issued by this Court approving the Stipulation resolving WELLS FARGO BANK, N.A.'s motion for relief from stay, a copy of which Order is attached hereto as **EXHIBIT A**. The Order provides for the cure of post-petition arrearage, and that in the event the Debtors fail to make the payments the secured creditor is permitted ex-parte relief to vacate the stay, with notice to the trustee, debtors, and debtor's attorney, if any.
3. Debtors have failed to comply with the aforesaid order by either missing payments and/or by failing to make the correct payments as summarized on the Notice of Default which was sent to all interested parties on 6/5/2019. A copy of the Notice of Default is attached as **EXHIBIT B**.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay without numerous court appearances.
5. I certify the above statements to be true. I am aware that if the above statements are willfully false, I am subject to punishment.

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

Dated: June 24, 2019

By: /s/ Amanda L. Rauer, Esquire

Amanda L. Rauer, Esquire

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Attorney for Movant